UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA				
AF Holdings, LLC,	Civil No. 12-1448 (JNE/FLN)			
Plaintiff,	Affidavit of Mark C. Santi, Esq.			
VS.				
John Doe(s),				
Defendant.				

STATE OF MINNESOTA) SS. COUNTY OF HENNEPIN)

- 1. I am a partner with Thompson Hall Santi Cerny & Dooley and represented the John Doe in this matter identified by IP Address 75.72.237.43. I make this Affidavit based on personal knowledge and submit this Affidavit for attorney fees and costs pursuant to the Court's November 6, 2013 Order.
- 2. I have been licensed to practice law since 2007 and am licensed in Minnesota, New York, and Florida. My regular hourly rate (which was charged in this matter) is \$290.
- 3. I performed the work itemized below as was required for my client's benefit and proper representation in this matter.
- 4. The hourly rates charged are reasonable in view of the nature of the work performed, the prevailing hourly rates charged by similarly experienced lawyers in the local area for similar work, and the results achieved. The requested fees are reasonable in light of the billing practices of other similarly experienced lawyers in the local area for similar work. Further, the amount of work performed has been necessary to properly represent my client. I have not charged my client for any unnecessary or duplicative work.

- 5. Under an hourly representation agreement my client has paid \$1,247.
- 6. I have not asked my client for full compensation for my services because, given the unfortunate nature of these cases, I offer as much *pro bono* services to John Does as I can afford. As I represented three John Does in these related matters, I have split my time by one third (1/3) when my work benefited all three clients.
- 7. I performed all of the work on the case at our firm and the fees total \$2,784. All of these fees were necessary for the proper representation of my client and are as follows:

Date	Description	Time
8/21/12	Analyze court docket re. status of case	.3
8/22/12	Office conf. with client; Analyze other matters against individual Doe's	1
8/27/12	Analyze similar cases; Office conf. with client; Placed phone call to M. Dugas	1.4
8/27/12	Phone conf. with M. Dugas re. settlement	.1
8/27/12	Phone conf. with client re. settlement offer	.2
8/27/12	Analyze email from client re. settlement	.1
8/28/12	Place call to M. Dugas re. settlement	.1
8/28/12	Phone conf. with M. Dugas re. settlement; Draft email to M. Dugas re. same; Draft email to client re. settlement	.2
8/28/12	Analyze email from client re. payment of settlement funds; Draft response to same	.1
8/28/12	Analyze email from M. Dugas and release; Draft email to client re. same	.2
8/28/12	Analyze email from client re. settlement payment and negotiation of settlement amount; Draft response to same	.2
8/29/12	Email correspondence with client re. receipt of payment and closing details	.1
8/30/12	Draft to email to M. Dugas re. confirmation of case dismissal and quashing of Subpoena	.1
8/31/12	Analyze emails from M. Dugas re. case dismissed, letter to Comcast, and original settlement document; Forward same to client; Analyze PACER re.	.2

	dismissal of case	
9/5/12	Analyze signed settlement agreement	.1
7/2/13	Email to client re. investigation of case and pursuit of sanctions	.3
7/26/13	Email with client re. status	.2
7/24/13	Phone conf. with client re. upcoming hearing	.2
7/29/13	Draft letter to Judge Noel re. appearance at case management conference	.2
7/31/13	Analyze order from Judge Noel re. appearance at case management conference; Emails with client re. same	.2
8/1/13	Legal research re. allegations made by Alan Cooper	.8
8/5/13	Analyze filings in preparation for Case Management Conference	.4
8/6/13	Travel to and attend hearing at case management conference	1.1
8/15/13	Emails with client re. status of the case and potential re-payment	.3
8/19/13	Analyze show cause order and draft email to client re. same	.2
8/26/13	Analyze response to Show Cause order; Emails with client re. same	.2
8/28/13	Emails with client re. recent Order	.2
11/7/13	Email with client re. Nov. 6 Order; Analyze Nov. 6 Order	.1
11/13/13	Draft and file Affidavit of Attorney's fees	.8

Total hours $9.6 \times \$290 \text{ per hour} = \$2,784.$

8. I ask that the Court issue an award of attorney fees, costs, and disbursements against Plaintiff and Prenda Law, Inc. in the amount of \$2,784 to "Thompson Hall Santi Cerny & Dooley" so that my clients may be reimbursed and so that I may be compensated for my time.

FURTHER AFFIANT SAYETH NOT.

Mark C. Santi

Sworn and subscribed before me this 13th day of November, 2013.

Notary Public

KATHERINE ROSE GRENELL
Notary Public
Minnesota
My Commission Expires January 31, 2016